

UNITED STATES DISTRICT COURT

for the
District of Hawaii

Division

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
Dec 30, 2022 1:15 p.m.
John A. Mannle, Clerk of CourtJason Ray Clark

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Case No. CV 22-00559 JAO-KJM

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ NoMichael Ray Trisler, et al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Jason Ray Clark
19580 Victorian Drive #306
Parker, Douglas
Colorado 80138
720.255.5711
jason@clarkbrothersinvestments.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

UNITED STATES DISTRICT COURT
For the District of HAWAII

Case No. _____

Jury Trial: YES

Jason Ray Clark, Claimant

-V-

Michael Ray Trisler, Brian Paul Trisler, Steven Wayne Trisler, George Ray Trisler (and aliases), Teresa A. Trisler, Ashley Rae Trisler, Gary & Susan Aliengena, Miriam L. Schaefer, Sunset Shores, Inc.; Pipeline Shores, LLC; Xander Holdings, LLC; et al.

Defendants

Charges: FRAUD, Fraudulent Misrepresentation and Deceit, Breach of Contract, Anticipatory Repudiation of a Contract, and Emotional Distress.

COMPLAINT FOR A CIVIL CASE

Claimant, Jason Ray Clark, seeks damages totaling \$51,756,101.

For Verbal Contract between Jason Ray Clark and Michael Ray Trisler for two-weeks for life vacation rental of Sunset Beach House at 59-066 Huelo St, Haleiwa, HI 96712; or Pipeline Beach House at 59-407 Ke Nui, Haleiwa, HI 96712; or Kawela Bay Beach House at 57-022 Pahipahialua Pl, Kahuku, HI 96731 verbally agreed to PRIOR to the initial purchase of the Sunset Beach House on 9/29/1995 by Michael Ray Trisler and Ray Trisler, et al.

Michael Ray Trisler and Jason Ray Clark made a verbal agreement for two weeks for life vacation rental in exchange for \$13,000 loan made by Jason Ray Clark to Michael Ray Trisler in order to buy the property at 59-066 Huelo St, Haleiwa, HI 96712 (Sunset Beach House) on 9/29/1995. Interest agreed to on that loan would be two weeks for life vacation rental. Two subsequent properties have since been purchased by Michael Ray Trisler, Ray Trisler, Brian Trisler, Teresa Trisler, Gary & Susan Aliengena, Miriam L. Schaefer, AND/OR others, et al. All of the above properties could be held in TRUSTS, and/or Legal Names of the Defendants, and/or separate but conjoining entities which may or may not include Sunset Shores, Inc; Pipeline Shores, LLC; Xander Holdings, LLC; AND/OR others, et al. Claimant, Jason Ray Clark, has used my two-week vacation rental at the Sunset Beach House, Pipeline Beach House, and Kawela Bay Beach House more than 20+ times for more than 20+ years; never once paying a dime as agreed to by Michael Ray Trisler. After Michael Ray Trisler tried to con, steal, gift, swindle, dupe Jason Ray Clark out of \$150,000 on another separate deal Michael Ray Trisler

ceased all communication with claimant Jason Ray Clark. Defendant, Michael Ray Trisler, has since paid back Jason Ray Clark the \$150,000. In regards to this issue, LuiBuenos II, there are still outstanding damages incurred by claimant, Jason Ray Clark. Michael Ray Trisler is a confidence Man (con man). There are numerous additional victims of Michael Ray Trisler practices of being a con artist, swindler, grifter, and fraudster that are relevant and material to claimants' case as they show a pattern of behavior that involves FRAUD, fraudulent activities and practices, and deceitful undermining misrepresentations to commit FRAUD.

s/ Jason R. Clark/ Pro Se Plaintiff

Jason R. Clark

Owner & Founder

Clark Brothers Investments/CBI

19580 Victorian Drive #306

Parker, CO 80138

Telephone: (720) 255.5711

Email: jason@clarkbrothersinvestments.com

Date of Signing: Dec 25, 2022

Signature of Plaintiff: Jason R. Clark

Pro Se Plaintiff Jason R. Clark

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Michael Ray Trisler
Stuntman
57-022 Pahi Pahi Place
Kahuku, Honolulu
Hawaii 96731
808. 348. 0888
tris808@gmail.com

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Brian Paul Trisler
Entrepreneur
258 Capricorn Drive
Emigrant, Park
Montana 59027
406. 222. 5736
BTrisler@hotmail.com

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Steven Wayne Trisler
US Army (Retired)
9565 SW 70th Loop
Ocala, Marion
Florida. 34481
812. 603. 8557
Steven.trisler@gmail.com

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

George Ray Trisler
Retired
682 Monte Vista Ct.
Greenwood, Johnson
Indiana 46143
812. 371. 6053
unknown

Defendant No. 5

Name Teresa A. Trisler
Job or Title Retired
Street Address 9565 SW 70th Loop
City and County Ocala, Marion
State and Zip Code Florida 34481
Telephone Number 812.350.0285
E-mail address terrytris42@gmail.com

Defendant No. 6

Name Ashley Rae Trisler
Job or Title Stuntwomen
Street Address 710 Walnut Drive SW
City and County Marietta, Cobb
State and Zip Code Georgia 30064
Telephone Number 970.749.8193
E-mail address unknown

Defendant No. 7

Name Gary Aliengena
Job or Title Stuntman
Street Address 6041 Highway 81 Apt 81
City and County Loganville, Walton/Gwinnett
State and Zip Code Georgia 30052
Telephone Number 770.554.9231
E-mail address CASDBLZ@aol.com

Defendant No. 8

Name Susan Aliengena
Job or Title Homemaker
Street Address 6041 Hwy 81 Apt 81
City and County Loganville, Walton/Gwinnett
State and Zip Code Georgia 30052
Telephone Number 435.602.9356
E-mail address CASDBLZ@aol.com

Defendant No. 9

Name Miriam L. Schaefer
Job or Title Assistant Mike Trisler
Street Address 59-487 Makua Road
City and County Haleiwa, Honolulu
State and Zip Code Hawaii 96712
Telephone Number 808.227.8139
E-mail address unknown

Defendant No. 10

Name Sunset Shores, Inc.
Job or Title Rental Business
Street Address 59-066 Huelo Street
City and County Haleiwa, Honolulu
State and Zip Code Hawaii 96712
Telephone Number 808.348.0888/808.227.8139
E-mail address tris808@gmail.com

Defendant No. 11

Name Pipeline Shores, LLC.
Job or Title Rental Business
Street Address 59407 Ke Nui
City and County Haleiwa, Honolulu
State and Zip Code Hawaii 96712
Telephone Number 808.348.0888 / 808.227.8139
E-mail address tris808@gmail.com

Defendant No. 12

Name Xander Holdings, LLC.
Job or Title LLC Rental Business
Street Address 870 South 300 West
City and County Heber City,
State and Zip Code Utah 84032
Telephone Number 808.227.8139 / 808.348.0888
E-mail address tris808@gmail.com

Defendant No. 13

Name _____
Job or Title _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail address _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Jason Ray Clark, is a citizen of the State of *(name)* Colorado.

b. If the plaintiff is a corporation

The plaintiff, *(name)* N/A, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* Michael Ray Trisler, is a citizen of the State of *(name)* Hawaii. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) Sunset Shores, Inc., is incorporated under
the laws of the State of (name) Hawaii, and has its
principal place of business in the State of (name) Hawaii.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the
same information for each additional defendant.) SEE attached.

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at
stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$51,756,101.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the
facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was
involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including
the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and
write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

SEE attached.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal
arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include
the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any
punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or
punitive money damages.

\$51,756,101.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

12/25/2022

Signature of Plaintiff

Jason R. Clark

Printed Name of Plaintiff

Jason Ray Clark

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____